EXHIBIT G

TO

PLAINTIFF'S REPLY IN SUPPORT OF 72(a)

AMY STEFFEN DEPOSITION

1   IN THE UNITED STATES DISTRICT COURT
             FOR THE EASTERN DISTRICT OF NEW YORK

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5   STEVE B. BARGER, an individual,   )
)
6   Plaintiff,   )
           v.   )
7   Case No. 1:17-cv-4869
)
8   FIRST DATA CORPORATION, et al.,   )
)
9   Defendants.   )

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12   CONFIDENTIAL

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                    D E P O S I T I O N
14

15   The DEPOSITION, of MS. AMY M.
         STEFFEN, taken on behalf of the Plaintiff,
16   before:

17   DANA L. BURKDOLL, CSR, RPR, CCR
                      Certified Court Reporter #1364
18   Registered Professional Reporter
                      Certified Shorthand Reporter

19

20   a Certified Court Reporter and
         Registered Professional Reporter, Regus
21   Offices, 1299 Farnam Street, Omaha, Nebraska
         68102; on the 21st day of August, 2018 at
22   9:44 a.m.

23

24

25   Job No. 28591

Page 66

1   time.
2 Q. Does the LOA help e-mail have any automatic
3   send features? And maybe I should ask that
4   better.
5   Are there any e-mails that leave the LOA
6   help e-mail address that do not require human
7   intervention to cause the send?
8 A. I don't know that question. The -- Jen's team
9   manages the LOA help box, I did not.
10 Q. What systems do the leave management team use
11   to process leave of absence requests?
12 A. They used our PeopleSoft HR help desk case
13   management tool, the .NET system and manual
14   spreadsheets. I don't know what other tools
15   Jen had, but those are the three that I'm most
16   aware of.
17 Q. The second one, help desk case management --
18   what was it called?
19 A. PeopleSoft has an -- an HR help desk program
20   that allows us to track requests, incoming
21   phone calls, e-mails and follow up on issues.
22   It's a case management tool.
23 Q. But you mentioned earlier that if you were an
24   exempt employee, your -- your paid time off was
25   not tracked in PeopleSoft; is that correct?

Page 67

1 A. That is correct.
2 Q. So how -- how does the PeopleSoft help desk
3   case management system interact with the OOO
4   system used to track paid time off?
5 A. They are two separate systems.
6 Q. So the -- the help desk case management
7   PeopleSoft program doesn't pull information as
8   to paid time off from the OOO system; is that
9   correct?
10 A. That is correct.
11 Q. So how -- how do you manage a leave case for an
12   exempt employee when you don't know -- when the
13   system doesn't have paid time off in it?
14 A. Jen's team would have access to the
15   out-of-office database to review those records.
16 Q. So that would be a manual process to look at
17   OOO and then put the information into the
18   PeopleSoft case management system? Is that how
19   they do it?
20 A. If it was necessary to notate it in the people
21   management -- I'm sorry, in the case management
22   system. Again, that was Jen's specific
23   process. I wasn't in the weeds every day with
24   her on her specific process.
25 Q. Now, this -- this e-mail we're looking at here,

Page 68

1   Exhibit 178, is this a form e-mail or was this
2   drafted by somebody using LOA help?
3 A. This is a templated e-mail that provides
4   necessary information.
5 Q. So does somebody physically input the dates and
6   name and employee ID or does that get generated
7   from the case management system you were
8   discussing?
9 A. I don't know.
10 Q. Was there a process or procedure to determine
11   who would be on the To line when receiving the
12   template initial leave request that's reflected
13   in 178 -- Exhibit 178?
14 A. Jennifer would need to -- Jennifer and her
15   leave team would need to answer that,
16   specifically. My general knowledge was that it
17   usually went to the manager of the owner
18   associate.
19 Q. And what is the purpose of this -- this e-mail
20   going to the manager of the owner associate?
21 A. To provide the manager with notification that
22   an initial leave request has been received by
23   the leave management team.
24 Q. Does the manager need to take any action upon
25   receiving this?

Page 69

1 A. At this time, no. You'll note that this says,
2   "Please note this is only a request. You will
3   be notified of formal approval, denial or
4   cancelation as soon as it's available."
5 Q. Okay. Why is the manager being advised when
6   the employee needs to provide medical forms?
7   MR. EIDELMAN: Objection. You can
8   answer.
9 A. This is just an initial leave request to notify
10   the manager they have an owner associate who
11   will -- who is potentially asking for time out
12   of the office.
13   BY MR. SHEARER:
14 Q. Would this line be different if they were
15   asking for time out of the office for having a
16   child?
17   MR. EIDELMAN: Objection.
18 A. I don't know. This is Jen's template.
19   BY MR. SHEARER:
20 Q. So you didn't -- when you were managing
21   Ms. Voycheske and the leave management team,
22   you didn't review their processes and
23   procedures for issuing leave letters like this?
24 A. No, I did not.
25 Q. Why not?

Page 74

1   2016?
2 A. No, I do not.
3 Q. Now, she sends this e-mail to the HR help desk
4   and HR service center, and this is why I was
5   asking the question for her. And -- and what
6   she says is, "Steve has reached out to MetLife
7   to apply for STD and needs to confirm the date
8   we reflect as last day worked before going out
9   on leave."
10   Why -- why would this go to the HR help
11   desk and HR service center instead of the LOA
12   help if this is related to Steve's leave?
13   MR. EIDELMAN: Objection.
14 A. There are several e-mail inboxes to the HR
15   service center, as I've previously shared with
16   you, and at times individuals got those boxes
17   confused, but all of those boxes were
18   redirected accordingly to the appropriate
19   person for response.
20   BY MR. SHEARER:
21 Q. So who would redirect them?
22 A. There are individuals on the team who have
23   access to the box. They would have seen this
24   come in and would have redirected it to the LOA
25   team.

Page 75

1 Q. What systems would someone in the HR service
2   center go to look for what is reflected as
3   Mr. Barger's last day worked before going out
4   on leave?
5 A. That request would have been handled by Jen's
6   team, specifically.
7 Q. What system would they have looked at?
8 A. I don't know specifically where Jen tracks all
9   that information.
10 Q. What systems do you know of at First Data that
11   track days worked and days not worked?
12 A. The out-of-office system.
13 Q. So OOO for exempt, is that what your testimony
14   was?
15 A. Yes.
16 Q. And PeopleSoft for nonexempt?
17 A. Correct, PeopleSoft Time and Labor.
18 Q. Did Rhonda Johnson have access to OOO?
19 A. Rhonda would have had access to OOO for her
20   specific profile. If she had other access at a
21   more administrative level, I'm not aware of
22   that. I didn't own that system.
23 Q. Could someone on Jennifer Voycheske's leave
24   management team access the OOO profile for
25   Mr. Barger?

Page 76

1 A. I believe they did have access to view time
2   off, yes.
3 Q. Did you say, "view time off"?
4 A. They could go into the system and see what
5   hours had been accumulated and/or taken.
6 Q. Could they change the hours in the system for
7   Mr. Barger?
8 A. I don't know what administrative privilege they
9   had. I didn't own that system.
10 Q. Could you have gone into OOO and changed
11   Mr. Barger's profile?
12 A. No. I only had access as the manager for my
13   direct reports.
14 Q. So when you say you, "only had access for my
15   direct reports," does that mean you could go
16   into OOO and change the profile of one of your
17   direct reports? Is that what you're saying?
18 A. I could go in and put -- if one of my direct
19   employees was out sick for the day, I could go
20   in and enter that time for them. If one of my
21   owner associates contacted me and needed to
22   take a vacation, I could go in and enter those
23   hours for them.
24 Q. So Mr. Barger was not one of your direct
25   reports, so you -- you're saying -- you're

Page 77

1   saying you could not go into OOO and change his
2   profile to report time off for Mr. Barger?
3 A. That is correct. That is my understanding.
4   Based on the access that I had to the system, I
5   could only see my direct reports.
6 Q. Can you think of a reason that your direct
7   reports would have greater access to the OOO
8   system than you?
9 A. I would need to work with the administrators of
10   that system to understand what access they were
11   granted.
12 Q. Now, Ms. Johnson in that e-mail to the HR help
13   desk was asking about assistance for Steve's
14   application for STD.
15   Does the general -- does a generalist
16   typically contact LOA help, HR help desk, HR
17   service center to assist employees with
18   completing forms?
19 A. Normally, no.
20 Q. How often do you think that that has happened?
21 A. It's extremely rare that I'm aware.
22 Q. Do you know why Rhonda Johnson got involved in
23   Mr. Barger's completion of his STD application
24   forms?
25 A. No, I am not aware.